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Group of Experts on European Agreement Concerning Work of Crews of Vehicles Engaged in International Road Transport (AETR)

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Item 3 (b) of the provisional agenda

Programme of work: Appendix 1C

Appendix 1C*

Transmitted by the Russian Federation

The present document provides comments from the Russian Federation on ECE/TRANS/SC.1/GE.21/2018/1/Rev.1.

* The present document has been submitted after the official documentation deadline due to resource constraints.



Transmitted by the Russian Federation

Proposed amendments to ECE/TRANS/SC.1/GE.21/2018/1/Rev.1 (proposals by Portugal for amendments to annex 1C in order to adapt the European Union specifications on smart tachographs to the AETR legal framework (as appendix 1C)).

The Russian Federation does not agree with the requirements laid out in paragraph (398a) of appendix 1C in respect of the certification of seals in accordance with standard EN 16882:2016. The paragraph includes a footnote indicating that the transition to the International Organization for Standardization (ISO) standard is scheduled to take place over a period of five years. The Russian Federation wishes to comment on the status of the transition to the ISO standard. In the absence of an ISO standard, the Russian Federation suggests that the paragraph should read as follows: “The seals mentioned shall be certified. The seal certificates with their images must be submitted to a laboratory whose public website contains an updated list of certified seals.”

The requirements of paragraph (133k) of appendix 1C stipulate that access to allowed digital (geographic) maps to support the border crossing monitoring function of the recording equipment shall be provided by the laboratory in charge of the interoperability tests for download from a dedicated secure website, in various formats.

The Russian Federation is of the view that the requirement should be supplemented by mention of the need for each update of the geographical map data to be agreed in order to ensure that there is coordinated agreement on the crossing point coordinates by the Contracting Parties within their territories, in view of the requirement in article 2 of the European Agreement Concerning Work of Crews of Vehicles Engaged in International Road Transport (AETR) that the Agreement shall apply in the territory of each Contracting Party to all international road transport performed by any vehicle registered in the territory of the said Contracting Party. Any Contracting Party should also be able to access downloads of digital maps in various formats from a dedicated secure website, including upon request to the laboratory.

The Russian Federation does not agree with the requirements of paragraph (226e) of appendix 1C regarding the addition of new functions directly related to the enforcement of European Union legislation on road transport. The Russian Federation proposes the following wording:

“The software update function shall be designed to support the following functional features, whenever provided for in the Agreement:

- Modification of the functions referred to in point 2.2, except the software update function itself;
- The addition of new functions directly related to the enforcement of Economic Commission for Europe requirements on road transport;
- Modification of the modes of operation in point 2.3;
- Modification of the file structure, such as the addition of new data or an increase in the file size;
- Deployment of software patches to address both software and security defects or reported malicious attacks on the functions of the control device.”

The Russian Federation requests clarification on the principles of interoperability between the control card and the workshop card in view of the fact that, in the Definitions section, the definition of “control card” explains that the control card provides access to the data stored in the data memory or in the driver cards and, where necessary, in the workshop cards for readout, but the table of card conflicts (Section 3, Construction and functional requirements for control device, requirement 73) indicates that control cards and workshop cards are incompatible.

The Russian Federation requests clarification of the principles for removal of the warning causes displayed, as specified in requirements 189 and 190 of Section 3, Construction and functional requirements for recording equipment.

The Russian Federation requests clarification of the change to the approval marks indicated in the appendix to appendix 1C. The Russian Federation notes that the approval marks were confirmed in the annex to the Agreement and should not be duplicated in the text of the appendix to appendix 1C. The Russian Federation is of the view that the type approval marks should be updated directly in the annex to the Agreement.

The Russian Federation notes that the Agreement does not contain the concept of “European Union member States” and that all Contracting Parties to the Agreement have equal status and have the right to choose for themselves the design of their distinguishing sign. In this connection, the Russian Federation proposes that the requirement in paragraph (229) of Section 4, Construction and functional requirements for tachograph cards, be worded as follows:

(229) The distinguishing sign of the Contracting Party may be affixed to any background displaying symbols of the Contracting Party. The distinguishing signs of the Contracting Parties must be distinctive and in accordance with the 1968 Vienna Convention on Road Traffic or the 1949 Geneva Convention on Road Traffic.

The Russian Federation considers that the following modifications should be made to appendix 1C:

The introduction to appendix 1C states that the first generation tachograph system complies with appendix 1B; however, appendix 1B contains requirements for the construction, testing, installation and inspection of the digital control device, not a first generation tachograph. The Russian Federation proposes that the Introduction and Definitions sections should be modified in line with the terms of the Agreement and appendix 1B, and that the newly introduced definitions should be reflected in the Definitions section. In the same subsection, it is stated that the first generation digital tachograph system has already been deployed on the territory of the Contracting Parties and may be used until the end of its life for domestic transportation. The Russian Federation is of the view that the Contracting Parties have the right to establish their own requirements for domestic transportation.

The Definitions section contains a definition “ff” of “open standard”, but the text of appendix 1C does not contain this term. The Russian Federation requests clarification as to whether the term should be added or the definition removed from the list of definitions. Furthermore, the Definitions section does not contain definitions of some terms used in the text, including: control device, on-board device and digital map.

Requirement MIG_003 in the General Provisions section, subsection 15, describes the procedure for suppressing the capability to use first generation tachograph cards. The Russian Federation proposes adding that this procedure may be initiated only after the Contracting Parties have so agreed in the Working Party.

Requirement (244) in Section 4, Construction and functional requirements for tachograph cards, has exactly the same wording as requirement 188 in appendix 1B, which contains the following footnote: “Reference text in the EU is Commission Directive 95/54/EC of 31 October 1995 adapting to technical progress Council Directive 72/245/EEC on the approximation of the laws of the Member States relating to the suppression of radio interference produced by spark-ignition engines fitted to motor vehicles (OJ No L 266, 08/11/1995).” The Russian Federation is of the view that the footnote to the requirement should also be retained in appendix 1C.

The Russian Federation insists that the subparagraphs of the requirements in the sections of appendix 1C should be put in proper order, including in respect of their placement in the various sections.

The Russian Federation asks that the requirements and footnotes that contain no information should be clarified or removed from the text of appendix 1C. For ease of reference, the data are shown in the table below:

<i>Page (English version of the text)</i>	<i>Content</i>	<i>Comments</i>
24	(aaaa) Reserved	This subparagraph is reserved and does not contain a description.
67	(237) Reserved	This subparagraph is reserved and does not contain a description.
69	4.5.1 Elementary files for identification and card management	This subparagraph contains only the title.
95	(424) Reserved	This subparagraph is reserved and does not contain a description.
159	2.84. Reserved for future use	This subparagraph is reserved and does not contain a description.
183	2.160. Reserved for future use	This subparagraph is reserved and does not contain a description.
219	2.230. Reserved for future use 2.231. Reserved for future use	This subparagraph is reserved and does not contain a description.
444	General Note: the keys described in this section are used for mutual authentication and secure messaging between vehicle units and tachograph cards and between vehicle units and external GNSS facilities. These processes are described in detail in chapters 0 and 0 of this sub-appendix.	No such chapters exist.
556	The communication – exchange of information/data between a DSRC-REDCR and a DSRCVU according to section 0 in a master-slave relationship to obtain the data.	No such section exists.
595	5.5. Reserved for future use	This subparagraph is reserved and does not contain a description.
598	DSC_78 Reserved for future use	This subparagraph is reserved and does not contain a description.